

UNITED STATES SECURITIES AND EXCHANGE COMMISSION DIVISION OF ENFORCEMENT

100 F Street, N.E. WASHINGTON, D.C. 20549-5977

April 30, 2015

Via ECF and Email

The Honorable Shira A. Scheindlin United States District Judge Southern District of New York 500 Pearl Street, Room 1620 New York, New York 10007-1312

Re: SEC v. Wyly, et al. 1:10-cv-5760

Dear Judge Scheindlin:

The Securities and Exchange Commission ("SEC") and the Relief Defendants attach a Proposed Scheduling Order for discovery and other pre-trial proceedings in this case. It incorporates the schedule previously agreed to and submitted to the Court, and includes "WHEREAS" clauses, and a paragraph vacating the expedited discovery provisions from this Court's "Asset Freeze" order of November 3, 2014. Based on the cooperative discovery achieved to date, and the time available for the additional discovery that will be necessary, the expedited provisions no longer appear necessary.

Respectfully,

John D. Worland, Jr.

D. Worland

cc: Counsel of record via email